

# EXHIBIT B

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Attorneys for Defendant ON-SITE MANAGER, INC.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

MICHAEL JOHNSON,

Plaintiff,

vs.

ON-SITE MANAGER, INC.,

Defendant.

Case No.: 5:15-cv-04409-BLF

**DEFENDANT ON-SITE MANAGER,  
INC.'S INITIAL DISCLOSURES**

Complaint filed: September 23, 2015

First Amended Complaint filed:

January 6, 2016

Trial Date:

TBD

Judge:

Hon. Beth L. Freeman

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

Pursuant to Federal Rules of Civil Procedure, Rule 26(a)(1), Defendant On-Site Manager, Inc., (hereinafter referred to as "Defendant"), hereby submits the following initial disclosures based upon information currently available to it. Defendant reserves the right to further correct, add, remove and/or otherwise supplement this disclosure pursuant to Rule 26(e).

**1. KNOWLEDGEABLE PERSONS**

a. Person Most Knowledgeable for Defendant On-Site Manager, Inc.

i. c/o Michael J. Saltz, Jacobson, Russell, Saltz, Nassim & de la  
Torre, LLP, 10866 Wilshire Blvd., Suite 1550, Los Angeles, CA  
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- b. Plaintiff Michael Johnson;
- c. Person Most Knowledgeable at River Pointe Apartments, 2361 Oak Harbour Dr, Sacramento, CA 95833, Tel: (916) 925-8688;
- d. Person Most Knowledgeable at Monticello at Southport Apartments, 2150 Valley Oak Ln, West Sacramento, CA 95691, Tel: (916) 617-2951;
- e. Person Most Knowledgeable at LeFever Mattson, Inc., 6359 Auburn Blvd, Citrus Heights, CA 95621, Tel: (916) 723-5111.

## 2. DOCUMENTS

- a. Tenant Screening Report on Michael Johnson dated June 9, 2015;
- b. All Case Files in the case of *Lefever Mattson Inc. v. Breanno Phillips, et al.*, Sacramento County Superior Court, Case No. 10UD10966;

## 3. DAMAGES

- a. Defendant seeks its costs in defending this action.

## 4. INSURANCE

- a. Defendant has insurance through Ace Group Claims, 10 Exchange Place, 9th fl, Jersey City, New Jersey 07302.

Dated: February 24, 2016

**Jacobson, Russell, Saltz,  
 Nassim & de la Torre, LLP**

/S/ Michael J. Saltz  
 Michael J. Saltz, Esq.,  
 Attorneys for Defendant On-Site Manager, Inc.

**PROOF OF SERVICE**

My business address is 10866 Wilshire Boulevard, Suite 1550, Los Angeles, California 90024. I am employed in the County of Los Angeles where this service occurs. I am over the age of 18 and am not a party to the within action. I am readily familiar with my employer's normal business practice for collection and processing of correspondence for mailing with the U.S. Postal Service, and that practice is that correspondence is deposited with the U.S. Postal Service the same day as the day of collection in the ordinary course of business.

On the date set forth below, following ordinary business practice, I enclosed a(n) ☒ true copy ☐ original of the following document(s) described as:

**DEFENDANT'S INITIAL DISCLOSURES**

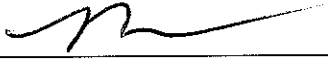
- ☐ (VIA FACSIMILE) by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below, on this date before 5 p.m.;
- ☒ (VIA MAIL) I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States mail at Los Angeles, California addressed as set forth below;
- ☐ (VIA OVERNIGHT DELIVERY) I caused such envelope(s) to be delivered to an overnight delivery carrier with delivery fees provided for, addressed as set forth below;
- ☐ (VIA PERSONAL SERVICE) I caused such envelope(s) to be delivered to a personal courier service to be hand delivered to the addressee below.

Stephanie R. Tatar  
Tatar Law Firm, APC  
3500 West Olive Ave, Suite 300  
Burbank, CA 91505

Attorneys for Plaintiff

Executed on February 24, 2016 at Los Angeles, California.

- ☒ (Federal) I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

  
\_\_\_\_\_  
Michael Saltz

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